

DOLORES Y. LEAL (134176)  
OLIVIA FLECHSIG (334880)  
ALLRED, MAROKO & GOLDBERG  
6300 Wilshire Blvd. Suite 1500  
Los Angeles, CA 90048-5217  
(323) 653-6530  
dleal@amglaw.com  
oflechtsig@amglaw.com

Attorneys for Plaintiff MARK SNOOKAL

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
A Limited Liability Partnership  
Including Professional Corporations  
TRACEY A. KENNEDY, Cal Bar No. 150782  
ROBERT E. MUSSIG, Cal. Bar No. 240369  
H. SARAH FAN, Cal. Bar No. 328282  
350 South Grand Avenue, 40th Floor  
Los Angeles, CA 90071-3460  
Telephone: 213.620.1780  
Facsimile: 213.620.1398  
E-mail: tkennedy@sheppardmullin.com  
rmussig@sheppardmullin.com  
sfan@sheppardmullin.com

Attorneys for Defendant.  
CHEVRON U.S.A. INC.,  
a Pennsylvania corporation

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,	)	CASE NO.: 2:23-cv-6302-HDV-AJR
	)	
Plaintiff,	)	<b>JOINT PROPOSED VERDICT FORM</b>
	)	
vs.	)	
	)	
CHEVRON U.S.A. INC., a California	)	District Judge: Hon. Hernan D. Vera
Corporation, and DOES 1 through 10,	)	Magistrate Judge: Hon. A. Joel Richlin
inclusive,	)	Action Filed: August 3, 2023
	)	Pre-Trial Conf.: July 29, 2025
Defendants.	)	Trial Date: August 19, 2025
	)	
	)	

1 Pursuant to the Court's Civil Trial Order, Plaintiff, Mark Snookal and Defendant  
2 Chevron U.S.A. Inc. through their respective counsel hereby file this Joint Proposed Verdict  
3 Form.  
4  
5

6 Dated: July 14, 2025

7 ALLRED, MAROKO & GOLDBERG

8  
9 By /s/ Dolores Leal  
10 DOLORES LEAL  
11 OLIVIA FLECHSIG  
12 Attorneys for Plaintiff  
MARK SNOOKAL

13 Dated: July 14, 2025

14 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

15  
16 By /s/ Tracey A. Kennedy  
17 TRACEY A. KENNEDY  
18 ROBERT E. MUSSIG  
19 H. SARAH FAN  
20 Attorneys for Defendant  
21 CHEVRON U.S.A. INC.,  
22 a Pennsylvania Corporation  
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**We, the jury, answer the questions submitted to us as follows:**

1. Was Chevron U.S.A. Inc. aware that Mark Snookal had a disability?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If your answer to question 1 is “Yes”, then answer question 2.

If you answered “No”, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Was Mark Snookal able to perform the essential job duties of the Reliability Engineering Manager position in Escravos, Nigeria with or without accommodation?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If your answer to question 2 is “Yes”, then answer question 3.

If you answered “No”, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did Chevron U.S.A. Inc. rescind the Reliability Engineering Manager position in Escravos, Nigeria to Mark Snookal?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If your answer to question 3 is “Yes”, then answer question 4.

If you answered “No”, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Was Mark Snookal’s disability or perceived disability a substantial motivating reason for Chevron USA, Inc’s decision to rescind the job offer for the Reliability Engineering Manager position in Escravos, Nigeria?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If your answer to question 4 is “Yes”, then answer question 5.

If you answered “No”, stop here, answer no further questions, and have the presiding juror sign and date this form.

1 5. Was Chevron USA's Inc's recission of the Reliability Engineering Manager position in  
2 Escravos, Nigeria a substantial factor in causing harm to Mark Snookal?

3 \_\_\_\_\_ Yes \_\_\_\_\_ No

4 If your answer to question 5 is "Yes", then answer question 6.

5 If you answered "No," stop here, answer no further questions, and have the presiding juror sign  
6 and date this form.

7  
8 6. Did Mark Snookal's disability pose a direct threat to his health and safety or the health and  
9 safety of others?

10 \_\_\_\_\_ Yes \_\_\_\_\_ No

11 If your answer to question 6 is "Yes", stop here, answer no further questions, and have the  
12 presiding juror sign and date this form. If you answered "No," then answer question 7.

13  
14 7. What are Mark Snookal's damages?

15 a. Past economic loss: \$ \_\_\_\_\_

16 b. Future economic loss: \$ \_\_\_\_\_

17 c. Past noneconomic loss, including physical pain/mental suffering:

18 \$ \_\_\_\_\_

19 d. Future noneconomic loss, including physical pain/mental suffering:

20 \$ \_\_\_\_\_

21 TOTAL \$ \_\_\_\_\_

22  
23 8. Should Mark Snookal receive prejudgment interest on the past economic damages?<sup>1</sup>

24 \_\_\_\_\_ Yes \_\_\_\_\_ No

25  
26 [continued]

27  
28 <sup>1</sup> This question is disputed by Defendant Chevron U.S.A. Inc.

1 **Signed: Presiding Juror** \_\_\_\_\_

2 **Dated:** \_\_\_\_\_

3 **After this verdict form has been signed, notify the clerk.**

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